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8 **UNITED STATES DISTRICT COURT**  
9 **DISTRICT OF NEVADA**

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SEP - 9 2019	
CLERK US DISTRICT COURT DISTRICT OF NEVADA	
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11 United States of America,  
12 Plaintiff,

13 v.

14 Kenneth Moore and Latoya Jones,  
15 Defendants.

Case No. 2:19-mj-00363-VCF

**~~Stipulation~~ to Continue Preliminary  
Hearing  
(Third Request)**

*ORDER*

17 The parties jointly request that this Court vacate the preliminary hearing scheduled for  
18 September 9, 2019, and continue it for at least 60 days because:

19 1. The government intends on making an early production of discovery to the  
20 defendants in an effort to reach a pre-indictment plea agreement. Two (of several) remaining  
21 lab tests are being rushed but remain incomplete. The government intends to disclose more  
22 discovery as it becomes available, and defense counsel will need time to review this discovery  
23 and discuss it with their clients.

24 2. A pre-indictment plea agreement would obviate the need for either a  
25 preliminary hearing or indictment by a grand jury.

26 3. Defendants are not incarcerated and do not object to a continuance.

1           4. Denial of this continuance would potentially prejudice the defendants and the  
2 government and would unnecessarily consume this Court's valuable resources.

3           5. Additionally, denial of this continuance could result in a miscarriage of justice.  
4 The additional time is excludable in computing the time within which the trial must  
5 commence under the Speedy Trial Act, 18 U.S.C. 3161(h)(7)(A), considering the factors  
6 under § 3161(h)(7)(B)(i), (iv).

7           This is the third request for continuance.

8           DATED: September 6, 2019.

9           Rene L. Valladares  
Federal Public Defender

Nicholas A. Trutanich  
United States Attorney

10  
11           */s/ Erin Gettel*  
By \_\_\_\_\_

*/s/ Shaheen Torgoley*  
By \_\_\_\_\_

12           Erin Gettel  
Assistant Federal Public Defender

Shaheen Torgoley  
Assistant United States Attorney

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14           */s/ Chris T. Rasmussen*  
By \_\_\_\_\_

15           Chris T. Rasmussen  
Counsel for Latoya Jones

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**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

United States of America,  
Plaintiff,

v.

Kenneth Moore and Latoya Jones,  
Defendant.

Case No. 2:19-mj-00363-VCF

**Order Granting Third Stipulation to  
Continue Preliminary Hearing**

Based on the Stipulation of counsel and good cause appearing,

IT IS ORDERED that the preliminary hearing currently scheduled on September 9,  
2019, at 4:00 p.m. is vacated and continued to November 15 at the hour of 4:00  
p.m.

DATED this 9<sup>th</sup> day of September, 2019.



UNITED STATES MAGISTRATE JUDGE

CAM FERENBACH  
U.S. MAGISTRATE JUDGE